

# **EXHIBIT 1**

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Uber's 6.19.2024 Response to Plaintiffs' 50 Priority Custodians. Columns A-I as provided by Pltfs. 6.17.2014

Last Name	First Name	Title	Employment Start Date (approx)	Employment End Date (approx)	First Litigation Hold	First Sexual Assault Litigation Hold	Plaintiff's Raionale for Inclusion	On JCCP proposed 143	Uber Response
Alexander	Eric	Regional Head of Business Development	2014-07-14	2017-06-07	2015-06-23	2023-10-23	Heavy involvement in investigating the 2014 Delhi incident and response to that and other sexual assault claims during 2014-2017 time frame.	Y	Not relevant; involvement is ex-US, was President of Business for Uber Asia Pacific; to the extent relevant, cumulative/duplicative of proposed custodian Pimentel.

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Amodeo	Michael	Sr Manager, Communications	2014-09-03	2019-09-13	2017-03-06	2015-07-31	High level communications manager during critical time period, often cited by media as an Uber spokesperson, including on sexual assault matters, safety issues, driver incentives, rental car partnerships, and local regulations.	N	Cumulative and duplicative of proposed custodian Holt.

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Anderson	Brooke	Sr Director, Product Communications	2015-03-16	Present	2016-05-19	2017-07-13	Head of Global Safety Communications from 2016 through 2019, and was intimately involved in "winning strategy" communications and other public campaigns.	Y	Limited relevance due to global role since 2016; cumulative and duplicative of the following proposed custodians: Boman, Breeden, Cardenas, Hazelbaker, as to U.S. safety communications.

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Ayento	Randy	Sr Manager, Claims, Cornersho pp Employee	2014-11-01	Present	2015-12-29	2017-07-13	Ayento is/was a Senior Manager in the Claims department and noted to be a member of the Incident Response Team, with a high propensity to be involved in complaint tickets.	N	Not relevant; outside of Rides business.

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Baker	Ed	Vice President, Growth	2013-09-03	2017-03-03	2013-12-04	2023-11-29	Vice President of Growth. Heavily involved in strategy and policies for bringing in new drivers including incentives and checks.	Y	Relevant communications likely to be in Kalanick's file; also cumulative and duplicative of Cinelli, Sheridan.

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Barnes	William	Director, GM	2012-03-05	2017-10-25	2016-03-24	2015-07-31	First 50 employee, Director, GM and at Uber for critical years of 2012 through 2017, managed operations for several states; oversaw inception of customer support org and driver empathy programs.	N	Cumulative and duplicative of the following proposed custodians: Holt, Kalanick, Kaiser.

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Barreto	Amos	Sr Staff Data Engineer	2011-09-05	2017-08-01	2015-06-23	none	High level data/software engineer. Created and led the Marketplace organization, responsible for providing efficient and reliable transport of passengers including dispatch optimization algorithms, supply positioning, and logistics.	N	Not relevant; role is attenuated from core issues in this litigation; to the extent relevant, cumulative and duplicative of proposed custodian Freivogel.

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Blinick	Adam	Sr Director, Public Policy	2014-08-11	Present	2017-05-14	2023-11-29	High level public policy manager/director involved in significant lobbying/communications with governmental leaders regarding regulatory compliance including background checks and TNC status.	Y	Attenuated relevance due to Canadian role from 2017-2019; cumulative and duplicative of the following proposed custodians: Hazelbaker, Breeden.

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Burke	Jordan	Director, Global Research & Insights	2015-06-08	2020-09-11	2017-03-10	none	Responsible for consumer and market research; responsible for reputation studies and marketing towards brand safety with focus on rider assaults; significant political/governmental ties.	Y	Limited relevance due to global role; inasmuch as relevant, cumulative and duplicative of the following proposed custodians: Hazelbaker, Holt, Lake, Parker, Silver.

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Byrne	Andrew	VP, Global Public Policy	2014-11-24	Present	2017-03-06	2023-11-29	Oversight of public policy team, responsible for coordinating lobbying efforts to ensure Uber remains in good standing with local officials and to fend off regulatory efforts that might negatively affect Uber.	Y	Global role - especially prior to 2019 when responsibilities were Europe-Focused Cumulative and duplicative of the following proposed custodians: Boman, Breeden, Hazelbaker, McLoughlin, Maiolino.

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Cabrera	Ashley	Sr. Program Manager - Safety Support	2016-12-08	2024-05-31	2019-08-23	2020-10-30	Uber employee for nearly a decade in the Safety Support department; managed critical issues within investigations department and provided branded support to customers; heavily involved with high priority cases with great visibility and used JIRA to prepare stakeholders for response	N	Cumulative and duplicative of the following proposed custodians: Baker, Freivogel, Gibbons, Kaiser, Richter-Eason, Stevenson.

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Chang	Frank	Vice President, Applied Science, Mid-Market Account Executive, Uber for Business	2014-03-01	Present	2019-10-03	2021-12-15	Lead data scientist and data and product analyst; Involved in the creation of systems and processes for handling misconduct allegations. Headed team and involved/responsible for taxonomy for safety report.	Y	Global role - burdensome and disproportional due to wide scope of responsibilities outside the scope of this litigation; to the extent relevant, cumulative and duplicative of the following proposed custodians: McDonald, Freivogel, Fuldner, Kaiser, Parker.

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Coker	Lucas	Investigations Operations Manager	2015-10-21	2019-08-02	2017-07-13	2017-07-13	Investigations Operations Manager for a key department; heavily involved responding to incident reports; in informing policies and procedures for trust and safety teams.	N	Cumulative and duplicative of the following proposed custodians: Brown, Gibbons, Richter-Eason, Stevenson.

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Dobbs	Chad	Director, Head of U.S. City Operations	2013-04-22	Present	2013-12-04	2021-12-15	Involved in broad areas of importance including background checks, safety report budgeting, peer-to-peer regulatory and legal issues, emergency call button feature, taxi regulations; has served as witness/provided declarations in lawsuits regarding independent contractor status, driver compensation.	N	Cumulative and duplicative of the following proposed custodians: Cinelli, Irving, Sheridan.

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Farrow	Caitlin	Investigations Team Lead I	2015-08-10	2020-04-12	2019-07-22	2019-05-08	Involved in managing and providing detailed reports and using Zendesk to respond to urgent customer incidents; provided strategic plans for process improvements within Jira; managed end-to-end investigation support experiences; crafted strategies to elevate an empathetic response for customers.	N	Cumulative and duplicative of the following proposed custodians: Baker, Cardenas.

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Flynn	John ("Four")	Chief Information Security Officer	2015-07-06	2020-07-27	2017-05-02	2023-11-29	Detailed knowledge of Uber's information systems and infrastructure.	Y	CISO role is very broad in scope and of limited relevance here; the following custodians have knowledge about relevant data systems: Baker, Freivogel.
Fogg	Chad	Sr. Manager, Global Ethics & Compliance	2015-05-11	Present	2016-03-24	2021-12-15	Involved in legal and regulatory compliance including in relation to rider assault claims.	N	Global role Cumulative and duplicative of the following proposed custodians: Cinelli, Holt.

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Foran	Timothy	Product Manager II	2013-09-23	2020-12-04	2013-12-04	2017-07-13	Significant involvement in driver onboarding, led program and operations management for all aspects of driver background checks in US; development of regulatory compliance processes and protocols; built program for automating background checks.	N	Limited role in core issues in this litigation; inasmuch as relevant, cumulative and duplicative of the following proposed custodians: Brown, Freivogel, Irving.

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Graves	Ryan	Sr Vice President, Operations	2010-03-05	2017-12-01	2013-12-04	2023-11-29	First Uber employee, involved with all aspects of Uber in formative years.	Y	Limited relevance, global role - title was SVP of Global Operations; inasmuch as relevant, cumulative and duplicative of the following proposed custodians: Holt, Kalanick.
Hawk	Cassie	Program Specialist III - Investigations	2017-04-03	Present	2020-06-24	2021-01-29	Created "playbooks" for investigations and collecting and analyzing quality assurance and trend data; improving investigations processes.	N	

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Hendrick	Susan	Manager, External Affairs	2016-05-09	Present	2017-07-13	2017-07-13	in response to sexual assault claims; served in Safety Communications and Federal Communicaitons roles.	N	Cumulative and duplicative of the following proposed custodians: Boman, Breeden, Cardenas, Hazelbaker, Maiolini, Richer-Eason.

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Henley	Mat	Director, Engineering	2015-06-15	2018-05-04	2015-03-04	2023-11-29	Head of Global Threat Operations; Led team of engineers, analysts and investigators for rider safety. Uber's first communications	Y	Not relevant; focus on cybersecurity that is far attenuated from core issues in this litigation. Inasmuch as relevant, cumulative and duplicative of proposed custodian Kalanick.

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Hourdajian	Nairi	Director of Corporate Product Communication	2013-06-01	2016-10-01	2015-01-26	2023-11-29	employee; built out the role over the course of 3 years; knowledge of Uber legal and regulatory obstacles.	Y	Cumulative and duplicative of the following proposed custodians: Carley, Hazelbaker, Holt
Johnson	Brian	Regional Operations Manager	2016-12-12	Present	2022-06-13	2023-11-29	Involved in customer safety initiatives, review and response to incident reporting.	Y	Cumulative and duplicative of the following proposed custodians: Akamine, Freivogel, Pimentel.

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Jones	Mark	Director, Public Safety - Analysis & Insights	2015-04-13	2023-08-01	2016-05-19	2015-07-31	Head of investigations and law enforcement operations/liaison; director of public safety; understands how data can be used to assist investigators and law enforcement; safety initiative strategy.	Y	Cumulative and duplicative of the following proposed custodians: Kaiser, McLoughlin.

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Joyce	Meghan	Sr. Director, Head of City Operations, US - Rides	2013-04-30	2019-04-12	2013-12-04	2023-11-29	Responsible for business outcomes and rider and driver experience in communities across the US & Canada; oversaw driver screening system, involved in lobbying, has spoken publicly about safety concerns for women riders.	N	Cumulative and duplicative of the following proposed custodians: Brown, Fuldner, Kaiser, Stevenson.

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Kawada Page	Jodi	Director, Chief of Staff to Chief Legal Officer	2016-12-12	Present	2019-04-06	2019-08-26	Significant role in legal department and communications over important time period.	Y	Not relevant due to Legal Department role; cumulative and duplicative of the following proposed custodians as to U.S. Safety Reports: Anthony, Boman, Fuldner, Hazelbaker, McDonald, Parker.

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Kintz	Justin	Vice President, Policy & Communications	2013-09-09	2021-02-01	2016-05-19	2023-11-29	Registered as lobbyist on behalf of Uber in numerous jurisdictions; considered public policy spokesperson for Uber; worked to educate lawmakers and policymakers about Uber's business model.	Y	Limited relevance due to significant ex-US involvement, including as VP Global Public Policy; inasmuch as relevant, cumulative and duplicative of the following proposed custodians: Hazelbaker, Breeden.

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Lewis (Avallon)	Jenny	Director, Marketing Strategic Initiatives	2014-07-07	2021-10-15	2016-12-29	2023-11-29	Led Uber's most innovative marketing campaigns to help drive rocket ship growth.	Y	Cumulative and duplicative of the following proposed custodians: Hazelbaker, Holt, Lake, Parker, Silver.

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MacDonald	Andrew	Senior Vice President, Mobility and Business Operations	2012-05-21	Present	2015-03-12	2023-11-29	Oversees teams that manage Global Rides business, Community Operations, Safety; one of the longest-tenured members of executive team; made public statements about in-app panic button.	Y	As Judge Schulman noted, cumulative and duplicative of the following proposed custodians with national roles: Cinelli, Holt, Irving.

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Maredia	Sarfraz	VP, RGM US&C Delivery	2014-09-15	Present	2017-07-13	2017-07-13	Prior to current role, considered to be the man who "ran" uber in NY; made public comments about improving safety using emergency button in response to kidnapping of female passenger in NY; involved in responding to incident reports.	Y	Limited relevance due to current non-Rides role and significant prior responsibilities outside of Rides business (VP for Uber Eats, Postmates before current role of Head of Americas, Delivery); to the extent relevant, cumulative and duplicative of the following proposed custodians: Holt, Akamine, Payne.

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Marshall	Jeff	Regional Lead, Community Operations	2015-04-01	2018-04-01	2015-07-31	2015-07-31	Part of Safety Response Team for deactivations; manager within safety investigations team 2015-2018.	N	Cumulative and duplicative of the following proposed custodians: Baker, Kaiser.

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Michael	Emil	Sr Vice President, Business	2013-09-03	2017-06-11	2016-11-09	2023-11-29	Uber Chief Business Officer during critical time period; takes credit for leading Uber through a period of exponential growth.	Y	Cumulative and duplicative of the following proposed custodians: Fuldner, Hazelbaker, Kalanick as to ELT development; cumulative duplicative of Cinelli, Irving, Sheridan as to business role.

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Patel	Niraj	GM, Consumer Vehicles	2014-08-04	Present	2017-06-03	2023-11-29	High level strategy manager who led projects across core business functions including strategy, operations, marketing, customer support; involved in managing internal communications; implementing customer support response policies.	N	Cumulative and duplicative of the following proposed custodians: Holt, Irving, Sheridan.

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Pham	Thuan	Chief Technology Officer	2013-04-15	2020-05-16	2015-03-04	2023-11-29	One of the longest-serving top executives at Uber, was part of Kalanick's "A team" of trusted advisers. Was involved with "building Uber."	Y	CTO role - limited involvement in issues in this litigation; inasmuch as relevant, cumulative and duplicative of the following proposed custodians: Fuldner, Kalanick.

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Picinich	Paul	Senior Manager, Fleets & 3P Supply	2015-05-11	Present	2015-12-29	2021-12-15	Leads vision, team design, and active management of a geo-distributed team of Regulatory Strategy & Operations Managers with focus on driver safety screenings, incidents, government data reporting, customer support, marketplace and regulatory strategy.	N	Limited relevance, outside of Rides business (fleets); to the extent relevant, cumulative and duplicative of proposed custodian Sheridan.

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Poetzscher	Cameron	VP, Corporate Development	2014-03-31	2018-10-24	2016-11-09	2023-11-29	Head of finance involved in measures to cut costs including related to background checks.	Y	Limited involvement in issues related to this litigation; inasmuch as relevant, cumulative and duplicative of proposed custodian Cinelli.
Rikhye	Vaibhav	Sr. Director, Strategy & Planning	2014-10-20	2021-04-23	2017-03-10	2023-11-29	Involved in discussions re: streamlining background check process for more efficient driver onboarding process.	Y	Cumulative and duplicative of the following proposed custodians: Brown, Freivogel, Irving.

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Schroeder	Eric	Various, including Senior Manager, Head of Safety & Consumer Protection Public Policy	2015-02-01	2021-01-01	2016-11-11	2021-12-15	Lead global safety operations; significant involvement in sexual misconduct policy discussions as well as individual incident reports.	Y	Limited relevance due to global role (Head of Global Safety Operations 2018-2021); to the extent relevant, cumulative and duplicative of the following proposed custodians: Brown, Fuldner, Freivogel, Gibbons, Kaiser, Richter-Eason, Stevenson.

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Shuping	Valerie	Sr. Program Manager, Tech	2015-03-23	2021-06-04	2016-07-15	2022-01-06	Operations and Logistics 3/15/19, then Global Safety manager 1/19-6/21. Involved with assessing driver safety risk and applicable driver policies based on risk assessment; work on driver appeals process; involved in analyzing Sexual Misconduct policy and suggesting updates to	N	Limited relevance due to global role (Global Safety Manager Program Mgr or Sr. Global Safety Program Mgr. 2019-2021); to the extent relevant, cumulative and duplicative of the following proposed custodians: Breeden, Gibbons, Payne, Sheridan

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Sullivan	Mike	Sr. Director, Public Safety - Global	2016-10-10	Present	2017-03-06	2023-11-29	protecting the safety of those who interface with Uber locally and globally where in which Uber operates; 100+ former attorneys, law enforcement professionals, military, intelligence officers, data scientists, and product engineers, bringing extensive and wide-ranging experience in public safety operations, counterterrorism, insider threat assessment, data privacy, global governance, risk management, technology innovation, and business continuity. Oversees liaison network and 24-7 public safety & health response team that fields requests from and deals with law enforcement and public health agencies to address serious incidents and emerging safety issues. Uber's first Chief Security Officer.	Y	Attorney who oversees team of attorneys; to the extent relevant, cumulative and duplicative of the following proposed custodians on the business side: Kaiser, McLoughlin.

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Sullivan	Joseph	Chief Security Officer	2015-04-27	2017-11-21	2015-03-04	none	hired at a time when Uber was experiencing multiple safety issues; focus on safety of riders and drivers	Y	CISO role is very broad in scope and of limited relevance here; the following custodians have knowledge about relevant data systems: Baker, Freivogel.

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Twomey	Pat	Director, Data Science	2012-06-04	2019-09-06	2013-12-04	none	Analytics leadership roles on numerous teams including Growth, Data Science, and Product Strategy. Involved with driver activation and analyzing and maintaining driver supply.	N	Cumulative and duplicative of the following proposed custodians: Brown, Cinelli, Holt, Kalanick, McDonald, Pimentel.

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Weber	Christopher	Senior Product Manager, Expansion	2013-06-26	2021-04-09	2013-12-04	2023-11-29	Early employee through important 2015-2018 time period; involved in background check development; public statements about "glaring" cultural problems within the company that surfaced in 20162017 that he attributes to "growing too quickly," and that business successes were "covering up some deficiencies in how we ran the business, how people were treated in the business."	Y	Not relevant due to global and non-rides roles - Global Head of Kitchen Collectives organization within Uber.

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West	Tony	Senior Vice President, Chief Legal Officer and Corporate Secretary	2017-11-20	Present	2017-11-17	2023-11-29	Leads Uber's Ethics functions; introduced transparency initiatives; Safety Reports released under his leadership.	Y	Attorney and CLO; cumulative and duplicative of the following proposed custodians as to US Safety Reports: Anthony, Boman, Hazelbaker, McDonald.

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Whaling	Kayla	Work Communications	2016-07-18	2021-09-21	2015-07-31	2015-07-31	Worked closely with Jodi Kawada Page. Worked in Safety Communications from 8/201610/2021. Responded to media re: sexual assault investigation, background checks, in-app emergency assistance, Safety Toolkit, Real-Time ID check, Verify Your Ride.	N	Cumulative and duplicative of the following proposed custodians: Boman, Breeden, Cardenas, Hazelbaker, Richter-Eason.

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Whetstone	Rachel	SVP of Communications and Public Policy	2015-06-08	2017-10-11	2016-05-19	2023-11-29	Head of policy and communications, media spokesperson; reported as someone who spoke freely within the company; direct involvement with handling of Delhi case.	Y	Limited relevance due to global role; cumulative and duplicative of the following proposed custodians: Breeden, Hazelbaker, Kalanick.

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White	Davis	Director, Policy & Communications	2016-02-01	2021-07-01	2019-10-03	2023-11-29	Involved with efforts regarding Uber's "kill list" of legislation Uber considers "anti-Uber"; involved considerations of background check requirements; worked with journalists to publish Uber pieces.	Y	Limited relevance to core issues in this litigation; to the extent relevant, cumulative and duplicative of the following proposed custodians: Breeden, Hazelbaker.

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Wing	Matthew	Director, Head of Earner PMM	2015-01-20	2022-08-01	2017-03-06	2017-07-13	Media spokesperson related to safety communications; decisionmaker regarding how and when to issue public response to sexual assault issues; involved in pressuring media to kill or change reports	N	Cumulative and duplicative of the following proposed custodians: Hazelbaker, Lake, Parker.

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Wuu	Jena	Senior Public Policy Associate, Safety	2012-09-10	2018-03-01	2016-05-19	2017-07-13	Early date of employment and employment through the Kalanick years; claims to be one of the "First 100" at Uber. Was involved with public policy, governmental interactions, and strategy; advocated for adoption of model rideshare safety legislation; development and implementation of core business operating principles regarding women's safety.	N	Not relevant; had primarily ex-US responsibilities; to the extent relevant, cumulative and duplicative of the following proposed custodians: Hazelbaker, Holt, Kalanick.